

Date	Attorney	Description	Hours
i. Case development, background investigation, and case administration			
11/18/2019	J. Murray	Call to potential co-counsel re litigation plans	0.8
11/18/2019	C. Flaxman	Call to potential co-counsel re possible litigation	0.8
11/18/2019	C. Flaxman	Review email from JM with possible claims	0.3
11/22/2019	J. Murray	Call to potential affiliate plaintiff	0.3
11/25/2019	J. Murray	Call to potential affiliate plaintiff	0.3
12/3/2019	J. Murray	Call w/ potential co-counsel re litigation plans	0.5
12/10/2019	C. Flaxman	Review & comment on chart regarding possible plaintiffs	0.1
12/10/2019	J. Murray	Call w/ potential co-counsel re litigation plans	0.5
12/11/2019	J. Murray	Call to experts on ACA operation and impact of rule	0.5
12/13/2019	J. Murray	Call to potential affiliate plaintiff	0.4
12/16/2019	J. Murray	Call to state AG re potential 1303 litigation	0.5
1/7/2020	C. Flaxman	Review final rule	0.8
1/7/2020	C. Flaxman	Draft emails to JM with thoughts on rule	0.4
1/7/2020	J. Murray	Call to affiliate re involvement in potential 1303 litigation	0.4
1/8/2020	M. Burrows	Review Rule; read emails for background to get up to speed on case	1.2
1/13/2020	J. Murray	TC w/ state AGs re potential 1303 litigation	0.5
1/13/2020	M. Burrows	Call with coalition partners re: litigation strategy and planned suits	0.5
1/13/2020	M. Burrows	Draft retainer agreements	0.3
1/13/2020	M. Burrows	Draft co-counsel agreements	0.3
1/14/2020	J. Murray	Call with insurer re impact of rule	0.5
1/14/2020	J. Murray	Call to client re factual development	0.3
1/15/2020	J. Murray	TC w/ state AG re: potential 1303 litigation	0.3
1/15/2020	M. Burrows	Call with T Hollander re potential plaintiff	1.3
1/16/2020	M. Burrows	Call with potential plaintiff	1.2
1/16/2020	M. Burrows	Call with Mariel DiDato re potential plaintiff	1.3
1/17/2020	M. Burrows	Call with potential plaintiff	0.7
1/22/2020	J. Murray	Discussion w/ C. Flaxman re potential consumer plaintiffs	0.5
1/22/2020	J. Murray	TCs w/ client re factual development and litigation hold	1
1/22/2020	M. Burrows	Call K Hambrick re potential plaintiff	1.5
1/27/2020	J. Murray	Call to state AG's office re 1303 litigation	0.3
1/28/2020	J. Murray	Call to state AG's office re 1303 litigation	0.5

1/29/2020	J. Murray	Call to M. Burrows re complaint and other preparation for case	0.5
1/29/2020	M. Burrows	Call with JM re litigation + filing plan	0.5
1/30/2020	A. Freeman	Initial e-mails from D. Jeon; call with M. Burrows; review e-mail from ACLU and articles found by Monica R. Basche re HHS rule	0.5
1/30/2020	A. Freeman	Conference call with co-counsel (.5); follow-up discussion with Monica R. Basche re venue, Local Rules re assignment of cases, call to M. Burrows re same (.4)	0.9
1/30/2020	J. Murray	TCs w/ multiple potential local counsel	1.5
1/30/2020	M. Basche	Telephone call with ACLU Staff Attorney Meagan Burrows and Andrew D. Freeman in person re case status (.2); conduct background research re DHHS program integrity rule (.9); telephone call with Meagan Burrows of the ACLU and Julie Murray from Planned Parenthood Federation of America (.5); confer in person with Andrew D. Freeman re next steps and follow-up telephone calls to Meagan Burrows (.4)	2
1/30/2020	M. Burrows	Call with JM & BGL re serving as local counsel	0.5
1/31/2020	A. Freeman	E-mails to/from M. Burrows and J. Murray re plaintiffs and defendants	0.2
1/31/2020	M. Basche	Confer in person with Eve L. Hill re APA lawsuits in the District of Maryland	0.3
1/31/2020	E. Hill	Confer with Monica R. Basche re. strategy to expedite judicial resolution	0.3
2/2/2020	A. Freeman	Review articles re the regulation, CMS's justification for same	0.3
2/3/2020	A. Freeman	E-mail from J. Murray re case caption, what address to use; discuss with Monica R. Basche re same	0.2
2/3/2020	J. Murray	Discussion w/ C. Flaxman re 1303 complaint	0.8
2/4/2020	M. Basche	Conduct research re APA cases in the United States District Court for the District of Maryland	1.1
2/5/2020	A. Freeman	E-mails to/from/to M. Burrows re requesting expedited review, discuss with Monica R. Basche re same	0.5
2/5/2020	A. Freeman	E-mail from/to/from J. Murray re corporate disclosure; discuss with Monica R. Basche re same	0.4
2/5/2020	A. Freeman	Conference call with co-counsel re schedule, filing issues (.5); follow-up discussion with Monica R. Basche (.2)	0.7
2/5/2020	M. Burrows	Lit team call re 1303 filing plan	0.5
2/5/2020	M. Burrows	Draft summonses & letter for scheduling conference	1.2
2/5/2020	M. Burrows	Review civil cover sheet & draft pro hacs	0.5
2/5/2020	M. Burrows	Review + incorporate comments to co-counsel ag. & send to team	0.2
2/5/2020	M. Basche	Confer in person with Andrew D. Freeman re next steps	0.5

2/5/2020	M. Basche	Review e-mails between Meagan Burrows and Andrew D. Freeman re motion for status conference, e-mails between Andrew D. Freeman and Meagan Burrows and Julie Murray re scheduling telephone call re strategy and next steps, and e-mail to co-counsel re same (.2); review e-mail from Julie Murray re corporate disclosure statement and research re same (.5); confer in person with Andrew D. Freeman re same (.2); review e-mails between Andrew D. Freeman and Julie Murray re same (.1)	1
2/5/2020	M. Basche	Conference call with Julie Murray, Carrie Flaxman, Meagan Burrows, and Andrew Beck with Andrew D. Freeman in person re case status and next steps (.5); confer in person with Andrew D. Freeman re next steps (.2)	0.7
2/6/2020	A. Freeman	Edit co-counsel agreement, e-mail same to co-counsel	0.4
2/7/2020	M. Burrows	Finalize co-counsel agreement and distribute to team	0.2
2/7/2020	M. Basche	Conduct research re Local Rules requirements for serving complaint on a federal government agency	0.4
2/8/2020	J. Murray	Call to co-counsel re complaint	0.6
2/8/2020	M. Burrows	Call with BGL + PP re BGL edits to Complaint	0.6
2/9/2020	M. Basche	Review Andrew D. Freeman's edits to Co-Counsel Agreement	0.1
2/10/2020	A. Freeman	E-mails re preparation to file Complaint tomorrow; discuss with Monica R. Basche; review final edits	0.5
2/10/2020	A. Freeman	E-mails from/to J. Murray, Monica R. Basche, M. Burrows re final edits, finalizing Complaint	0.3
2/10/2020	J. Murray	Reviewed summonses, civil cover sheet, PHV motion for filing	0.6
2/10/2020	J. Murray	TC w/ co-counsel and states involved in other 1303 lawsuits	0.7
2/10/2020	M. Burrows	Call with State AGs + co-counsel re 1303 litigation	0.7
2/10/2020	M. Basche	E-mails from/to Julie Murray and Andrew D. Freeman re revised draft of Complaint and e-mail from Julie Murray re summonses, civil cover sheet, and pro have vice filings	0.1
2/10/2020	M. Basche	Confer in person with LaClaudia Dyson re preparing summonses and proof of service	0.1
2/11/2020	A. Freeman	Notice of assignment of case to Judge Blake; e-mail to/from co-counsel re same	0.2
2/11/2020	A. Freeman	E-mail from/to J. Murray re reaching out to DOJ re attorneys defending case and re schedule; e-mails re service on U.S. Attorney; Notice of Service re same	0.4
2/11/2020	M. Burrows	Alert plaintiffs of litigation/filing & discussion of next steps	0.5
2/11/2020	M. Basche	Review e-mails between Andrew D. Freeman and Julie Murray re service of Complaint and request for a scheduling conference with Judge Blake	0.1
2/11/2020	M. Basche	Review e-mail from Andrew D. Freeman to co-counsel re proof of service for the U.S. Attorney for Maryland and CM/ECF notification re same	0.1
2/12/2020	A. Freeman	E-mails re pro hac vice admissions, notice of service	0.1

2/12/2020	M. Basche	Confer in person with LaClaudia Dyson re return of service for Robert Hur	0.1
2/13/2020	A. Freeman	Meet with Monica R. Basche re co-counsel's proposed briefing schedule	0.2
2/13/2020	A. Freeman	Review, sign, and circulate BGL's addendum to common interest agreement	0.2
2/13/2020	M. Burrows	Review letter to court seeking status conference & circulate to team	0.2
2/13/2020	M. Basche	E-mail from/to Meagan Burrows re reviewing draft of Letter to Court re Expedited Status Conference and e-mail from/to Julie Murray re suggested briefing schedule (.1); review and edit draft letter to Judge Blake requesting expedited ruling (.7); confer in person with Anthony J. May re same (.1); e-mail to Andrew D. Freeman re same (.1); confer in person with Andrew D. Freeman re proposed briefing schedule (.2); e-mail to co-counsel re same (.1)	1.3
2/14/2020	A. Freeman	Review and edit letter to Judge Blake requesting status conference re briefing schedule, e-mails from/to/from co-counsel re same; e-mail from M. Burrows with revised letter to Judge Blake, e-mail from Monica R. Basche with edits to same, edit same and send to co-counsel; e-mail from J. Murray re her call with DOJ attorney re same	0.6
2/14/2020	J. Murray	Call to Fed Programs atty re schedule in case	0.1
2/14/2020	M. Burrows	Edit letter requesting status conference + circulate	0.5
2/14/2020	M. Basche	E-mail and text message to Andrew D. Freeman re reviewing draft of letter to Court re expedited status conference (.1); e-mail from Andrew D. Freeman re same (.1); confer via telephone with Andrew D. Freeman re same (.1); edit revised draft of letter to Court re expedited status conference and e-mail to Andrew D. Freeman re same (.2); review e-mails between Julie Murray and Andrew D. Freeman re efforts to confer with Defendants re Motion for Summary Judgment briefing scheduling and draft of letter to Court re expedited status conference (.1)	0.6
2/18/2020	J. Murray	TC with State AGs involved w/ other 1303 suits	0.4
2/18/2020	M. Burrows	TC re 1303 litigation with state AGs + PP	0.4
2/18/2020	M. Basche	E-mail from/to Meagan Burrows re wet or e-signatures on declarations and research re same	0.3
2/19/2020	J. Murray	Call to opposing counsel re: briefing schedule	0.2
2/20/2020	J. Murray	Call to insurer re: impact of rule	0.5
2/24/2020	A. Freeman	E-mail from C. Flaxman with DOJ's proposed revisions to schedule; discuss with Monica R. Basche re same; e-mails from A. Beck and Monica R. Basche re same	0.1
2/24/2020	M. Basche	Review e-mails from co-counsel re Motion for Summary Judgment briefing schedule and e-mail to co-counsel re same (.1); confer in person with Andrew D. Freeman re case status and next steps (.2)	0.3

2/26/2020	M. Basche	E-mail from/to Carrie Flax re filing Joint Motion for Expedited Briefing Schedule, e-mail to/fom Andrew D. Freeman re same, and e-mail to LaClaudia Dyson re same (.1); edit same and e-mail same to LaClaudia Dyson (.1)	0.2
2/27/2020	M. Basche	Confer in person with Andrew D. Freeman re reviewing Motion for Summary Judgment (.1); e-mails to/from co-counsel re cite checking Motion for Summary Judgment (.1)	0.2
2/27/2020	M. Basche	Confer in person with Andrew D. Freeman re reviewing Motion for Summary Judgment and e-mail to co-counsel re same	0.1
3/1/2020	A. Freeman	E-mail from J. Murray with draft motion and order, e-mails from/to J. Murray re filing Motion for Summary Judgment Tomorrow	0.2
3/2/2020	M. Basche	E-mail from/to Julie Murray re filing Motion for Summary Judgment	0.1
3/3/2020	J. Murray	TC w/ state AGs involved in other 1303 suits	0.5
3/17/2020	A. Freeman	E-mails from/to Monica R. Basche re District of Maryland Order extending time for filings; e-mail from Monica R. Basche to co-counsel re same	0.1
3/17/2020	M. Basche	E-mail to/from Andrew D. Freeman re District of Maryland's Standing Order extending filing deadlines and its impact on the summary judgment motions schedule (.2); e-mail to Julie Murray, Carrie Flaxman, Andrew Beck, and Meagan Burrows re same (.2)	0.4
3/19/2020	M. Burrows	Review draft letter to court re COVID order	0.1
3/19/2020	M. Basche	Read e-mails from Julie Murray and Andrew D. Freeman re changes in Motion for Summary Judgment briefing schedule due to coronavirus outbreak, e-mail from Julie Murray re administrative record	1
3/19/2020	M. Basche	Read draft of letter to Judge Blake requesting a status conference re changes to Motion for Summary Judgment briefing schedule due to the Court's order related to the coronavirus outbreak	0.1
3/19/2020	M. Basche	Read and respond to e-mail from Julie Murray re letter to HHS re delaying implementation of the Separate Billing Rule due to the coronavirus outbreak	0.1
3/19/2020	M. Basche	Murray with draft letter to Judge Blake requesting scheduling conference, edit same (.3)	0.5
3/20/2020	A. Freeman	E-mails re downloading administrative record	0.1
3/20/2020	M. Basche	Forward link to download Administrative Record and Administrative Record Certification and Index to LaClaudia Dyson to save to the DMS	0.1
3/20/2020	M. Basche	Read e-mail from Andrew D. Freeman re downloading and saving Administrative Record to the DMS, e-mail to Julie Murray re granting LaClaudia Dyson access to download the Administrative Record	0.1
3/20/2020	M. Basche	Telephone calls with Andrew D. Freeman re filing letter to Judge Blake requesting a conference (.1); file same via CM/ECF (.2, N/C)	0.1

3/21/2020	A. Freeman	E-mail to J. Murray, et al., re seeking delay in implementation of rule	0.2
3/21/2020	M. Basche	Read e-mail from Andrew D. Freeman re delayed implementation of the Separate Billing Rule due to the coronavirus outbreak	0.1
3/24/2020	M. Burrows	TC re 1303 litigation with state AGs + PP	1
3/25/2020	A. Freeman	E-mail from S. James (Judge Blake's assistant) re scheduling conference call with Judge Blake and all counsel; e-mails from/to co-counsel re same; e-mail from Monica R. Basche to S. James; e-mail from B. Humphreys (DOJ attorney) to S. James re same	0.3
3/25/2020	A. Freeman	E-mails to/from co-counsel re preparation for call with Judge Blake	0.2
3/25/2020	A. Freeman	E-mail from J. Murray forwarding B. Humphreys' e-mail re possibility of delaying rule; respond to same	0.1
3/25/2020	M. Basche	Read e-mails from Julie Murray, Andrew D. Freeman, Megan Burrows, and Andrew Beck re availability for conference call, read and respond to e-mail from Judge Blake's Judicial Assistant re same	0.1
3/25/2020	M. Basche	Read e-mail from Judge Blake's Judicial Assistant confirming conference call with Judge Blake at 4 pm on March 26, 2020, create and send Outlook calendar invite re same to Andrew D. Freeman and co-counsel	0.1
3/25/2020	M. Basche	Read e-mails from Julie Murray and Andrew D. Freeman re scheduling conference call re Motion for Summary Judgment briefing schedule before conference call with Judge Blake re same	0.1
3/26/2020	A. Freeman	E-mail from J. Murray re calling DOJ attorneys re possible delay in implementation of rule; follow-up e-mail from J. Murray re HHS proposal for 60-day extension; e-mails to/from C. Flaxman and between counsel and S. James re postponing today's call with Judge Blake	0.5
3/26/2020	M. Basche	Read e-mails from Andrew D. Freeman and Julie Murray re opposing counsel's proposal to delay implementation of Separate Billing Rule	0.1
3/26/2020	M. Basche	Read e-mail from Julie Murray re opposing counsel's proposal to delay implementation of Separate Billing Rule, e-mail from Andrew D. Freeman re postponing status conference with Judge Blake	0.1
3/31/2020	A. Freeman	E-mail to co-counsel re status of HHS delaying rule, notifying Judge Blake re amending briefing schedule	0.1
4/1/2020	A. Freeman	E-mails from/to C. Flaxman and co-counsel re defendants' proposal for new schedule	0.2
4/1/2020	M. Basche	Read e-mails from Andrew D. Freeman and Carrie Flaxman re whether HHS is delaying the Separate Billing Rule	0.1

4/1/2020	M. Basche	Read e-mails from Andrew D. Freeman, Carrie Flaxman, Meagan Burrows, and Andrew Beck re HHS delaying implementation of Separate Billing Rule and new Motions for Summary Judgment briefing schedule	0.1
4/8/2020	M. Basche	Read e-mail from Carrie Flaxman re status of staying enforcement of Separate Billing Rule	0.1
4/10/2020	A. Freeman	Forward new D. Md. Standing Order to co-counsel	0.1
4/13/2020	A. Freeman	E-mails from J. Murray, et al. re HHS's response re not knowing timetable for publishing 60-day delay; e-mail to co-counsel re possible responses	0.3
4/13/2020	M. Basche	Read e-mails from Julie Murray, Andrew Beck, and Meagan Burrows re revised briefing schedule for Motion for Summary Judgments due to coronavirus pandemic and potential implementation delay of Separate Billing Rule (.1); read e-mail from Andrew D. Freeman re same (.1)	0.2
4/13/2020	M. Basche	Read e-mail from Julie Murray to Judge Blake's Judicial Assistant re scheduling a status conference	0.1
4/14/2020	A. Freeman	E-mail from S. James re conference call with Judge Blake this afternoon and requesting letter in advance; e-mails from R. Humphrey and S. James re procedure for filing letter	0.1
4/14/2020	A. Freeman	E-mails from/to J. Murray and co-counsel re letter to Judge Blake re schedule; edit and file same	0.4
4/14/2020	A. Freeman	Letter from defendants to Judge Blake re schedule; review history of schedule in preparation for call with Judge Blake; e-mail to co-counsel re same	0.3
4/14/2020	A. Freeman	E-mails from/to co-counsel re Proposed Order re briefing schedule	0.1
4/14/2020	J. Murray	Drafted letter to court	0.3
4/14/2020	J. Murray	Emailed client re status conference	0.1
4/14/2020	M. Burrows	Review letter to court re: position on briefing schedule	0.1
4/14/2020	M. Basche	Read e-mails re status conference with Judge Blake re Motions for Summary Judgment briefing schedule, review letter to Judge Blake re Plaintiffs' position on Motions for Summary Judgment briefing schedule	0.1

5/1/2020	A. Freeman	E-mails from/to/from/to J. Murray and M. Burrows re HHS's 60-day extension of rule, possible extension of briefing schedule and amendment of complaint	0.3
5/1/2020	M. Basche	Read e-mails from Julie Murray, Meagan Burrows, and Andrew D. Freeman re delayed implementation of the Separate Billing Rule	0.1
5/6/2020	J. Murray	Email/TC with client re HHS brief / amending complaint	0.2
5/7/2020	A. Freeman	E-mails to/from J. Murray re filing motion to amend complaint, schedule for drafting reply/opposition summary judgment brief	0.1
5/8/2020	A. Freeman	E-mails from/to J. Murray, M. Burrows, Monica R. Basche re amending complaint, responding to HHS's Motion for Summary Judgment	0.4
5/8/2020	M. Basche	Read e-mail from Andrew D. Freeman re filing Amended Complaint, read e-mail from Julie Murray re possible filing motion for class certification, draft and send e-mail to Andrew D. Freeman re same (.3); read and respond to e-mail from Andrew D. Freeman re same (.1)	0.4
5/12/2020	M. Burrows	Talk to Tanja + Kristy re case status + class rep	1
5/14/2020	M. Burrows	Talk to Rebecca and Marial re case status + class reps	1.1
5/15/2020	A. Freeman	E-mails from/to J. Murray, M. Burrows, Monica R. Basche re motion to amend; review, edit and e-mail same to co-counsel	0.5
5/15/2020	A. Freeman	E-mails from/to co-counsel re motion for class certification, declarations in support	0.2
5/15/2020	M. Basche	Read and respond to e-mail from Julie Murray re standards for granting motion for leave to amend and supplement complaint	0.7
5/18/2020	A. Freeman	E-mail from clerk re correcting Amended Complaint; review Local Rule 102.2; calls to/from Monica R. Basche re same; e-mails re re-filing	0.4
5/18/2020	M. Basche	Read and respond to e-mail from Julie Murray re re-filing Motion for Leave to File Amended and Supplemental Complaint (.1); confer via telephone with Andrew D. Freeman re same (.1); telephone call with Case Administrator for case re same, e-mail to LaClaudia Dyson re same (.1)	0.3
5/18/2020	M. Basche	E-mails from/to Andrew D. Freeman, Julie Murray, Carrie Flaxman, and Meagan Burrows re Motion for Class Certification	0.3
5/19/2020	A. Freeman	E-mails re filing of Amended Complaint	0.1
5/19/2020	A. Freeman	E-mails re finalizing and filing motion for class certification, review same and exhibits to same	0.4
5/19/2020	M. Basche	Read and respond to e-mails from Julie Murray and Meagan Burrows re Motion for Class Certification, draft and send e-mail to Andrew D. Freeman re same	0.3

5/22/2020	M. Basche	Read e-mails from Julie Murray, Meagan Burrows, and Andrew D. Freeman re Opposition to Defendants' Cross-Motion for Summary Judgment and Reply in Support of Plaintiffs' Motion for Summary Judgment, respond to e-mail from Julie Murray re same	0.1
5/28/2020	A. Freeman	E-mails from/to J. Murray and other co-counsel re DOJ's proposal to adjust briefing schedule	0.1
5/28/2020	M. Basche	Read and respond to e-mail from Julie Murray re proposed briefing schedule for supplemental briefing on new implementation date of the Separate Billing Rule and Motion for Class Certification	0.1
6/2/2020	A. Freeman	E-mails from/to J. Murray and M. Burrows re defendants' request to extend briefing schedule	0.1
6/2/2020	M. Basche	Read and respond to e-mail from Julie Murray re supplemental briefing schedule for delayed implementation date of the Separate Billing Rule	0.1
6/3/2020	J. Murray	Reviewed admin record produced by HHS	0.5
6/3/2020	J. Murray	Drafted emails to other stakeholders re completeness of admin record	0.2
6/8/2020	M. Basche	Read and respond to e-mail from Andrew D. Freeman re Joint Motion for Entry of Supplemental Briefing Schedule and Proposed Order, e-mail to Julie Murray re same	0.1
6/9/2020	A. Freeman	E-mails from/to J. Murray re joint motion to revise schedule	0.1
6/9/2020	M. Basche	Read and respond to e-mail from Julie Murray re revised Supplemental Memorandum In Support of Plaintiffs' Motion for Summary Judgment and revised briefing schedule for same	0.1
6/10/2020	A. Freeman	E-mail from M. Brown to B. Humphreys re submitting administrative record to court; e-mails from co-counsel re same; Humphreys' response	0.1
6/10/2020	M. Basche	Read e-mail from Judge Blake's law clerk re copy of the administrative record, forward e-mail to Julie Murray, Meagan Burrows, Andrew Beck, and Carrie Flaxman (.1); e-mail from/to Julie Murray re the administrative record (.1)	0.2
6/10/2020	M. Basche	Read e-mail from Bradley Humphreys to Judge Blake's law clerk re copy of the administrative record	0.1
6/10/2020	M. Basche	E-mails from/to Julie Murray re QC notice for supplemental Motion for Summary Judgment brief (.1); telephone call with the Case Administrator, Briana Hilberg, re resolving QC notice (.1); e-mail to Julie Murray re same (.1)	0.3
6/25/2020	M. Basche	E-mails from/to Meagan Burrows, Andrew D. Freeman, and LaClaudia Dyson re filing Reply In Support of Motion for Class Certification	0.2
6/25/2020	M. Basche	Read e-mail from Julie Murray re hearing in California Separate Billing Rule case	0.1
6/26/2020	A. Freeman	E-mails re filing reply in support of class certification; call with Monica R. Basche re same	0.1

6/26/2020	A. Freeman	E-mails from/to co-counsel re submitting notice of supplemental authority re DACA decision	0.1
6/26/2020	M. Burrows	Review draft letter to Judge Blake re DACA decision	0.2
6/26/2020	M. Basche	E-mails from/to LaClaudia Dyson and Andrew D. Freeman re preparing Consumer Plaintiffs' Reply In Support of Motion for Class Certification (.2); confer via telephone with Andrew D. Freeman re same (.1)	0.3
6/30/2020	A. Freeman	E-mails re uploading the administrative record	0.1
9/4/2020	A. Freeman	Defendants' notice of appeal	0.1
9/18/2020	A. Freeman	Notice of transmission of notice of appeal	0.1
9/21/2020	M. Basche	Read and respond to e-mail from LaClaudia Dyson re admission into the bar for the United States Court of Appeals for the Fourth Circuit	0.1
9/21/2020	M. Basche	Register to e-file in the United States Court of Appeals for the Fourth Circuit (.2); e-mails to LaClaudia Dyson re same (.2)	0.4
9/21/2020	M. Basche	Review Appearance of Counsel form and e-mail to LaClaudia Dyson re filing same	0.1
9/30/2020	J. Murray	Reviewed 4th Cir orders and provided instructions to paralegal for preparation of required disclosures	0.2
10/1/2020	J. Murray	Reviewed 4th Cir rules for briefs/appendix and instructed paralegal re related tasks for answering brief	0.3
10/2/2020	A. Freeman	Docketing Statement and Briefing Statement	0.1
10/2/2020	A. Freeman	E-mails re filing disclosure statements for plaintiffs	0.1
10/6/2020	M. Basche	E-mail from/to Meagan Burrows, Carrie Flaxman, Julie Murray, and Andrew D. Freeman re extensions of time for Fourth Circuit briefing schedule	0.1
10/6/2020	A. Freeman	E-mail from defendants requesting extension in briefing schedule; e-mails from/to co-counsel re responding to same	0.1
11/20/2020	A. Freeman	E-mails re Joint Appendix	0.1
11/21/2020	M. Basche	Read e-mails between Andrew D. Freeman and Julie Murray re Joint Appendix and requesting extension of time to file Opposition	0.1
11/21/2020	A. Freeman	E-mails from/to J. Murray and other co-counsel re defendant's inquiry re joint appendix, possibility of extension of time for our brief	0.1
11/23/2020	M. Burrows	Review + comment on JA designations	
11/23/2020	M. Basche	Read e-mails from Meagan Burrows, Julie Murray, and Andrew D. Freeman re designations for Joint Appendix	0.1
11/23/2020	A. Freeman	E-mails from/to co-counsel re list of documents for Joint Appendix	0.1

12/3/2020	M. Basche	Read e-mails from Julie Murray, Carrie Flaxman, and Meagan Burrows re draft Motion for an Extension of Time to File a Principal Brief (.1); review same (.1); e-mail to Andrew D. Freeman re same (.1)	0.3
12/4/2020	M. Basche	Read e-mails between Andrew D. Freeman and Julie Murray re draft Motion for an Extension of Time to File a Principal Brief	0.1
1/27/2021	M. Basche	Read e-mails from co-counsel and Andrew D. Freeman re opposing counsel's proposal to place case in abeyance pending review by new administration's officials	0.1
ii. Pleadings			
12/17/2019	J. Murray	Call to expert re ACA legislative record ISO complaint drafting	0.5
1/15/2020	M. Burrows	Call with R Barson re potential plaintiff	1.1
1/15/2020	M. Burrows	Draft Barson & Hollander declarations based on calls	1.2
1/16/2020	M. Burrows	Draft DiDato declaration based on call	0.8
1/22/2020	M. Burrows	Draft Hambrick delcaration based on call	0.8
1/24/2020	J. Murray	Drafted complaint	5.5
1/26/2020	J. Murray	Drafted plaintiff declaration	3
1/27/2020	J. Murray	Drafted plaintiff declaration	0.8
1/27/2020	J. Murray	Drafted and edited plaintiff declarations	8.1
1/27/2020	J. Murray	Drafted complaint	2.8
1/27/2020	M. Burrows	Revise individual plaintiff declarations based on PP comments	1.2
1/28/2020	M. Burrows	Review and comment on PP affiliate declaration drafts	0.5
1/29/2020	J. Murray	Drafted complaint	7
1/30/2020	M. Burrows	Read State AG Complaint (Cal & NY)	0.5
1/31/2020	J. Murray	Drafted complaint	2
1/31/2020	M. Burrows	Call with R Barson re delcaration	1.1
1/31/2020	M. Burrows	Call with Mariel re delcaration	1
1/31/2020	M. Burrows	Revised Barson and DiDato declarations based on convo	0.5
2/1/2020	J. Murray	Drafted complaint	5.7
2/2/2020	J. Murray	Drafted complaint	1.7
2/3/2020	C. Flaxman	Review draft complaint and comment	1.3
2/3/2020	J. Murray	Factual research ISO complaint	3.2
2/3/2020	M. Burrows	Review WA AG complaint	0.2

2/3/2020	M. Burrows	Call with Kristy re declaration	1.1
2/3/2020	M. Burrows	Call with Tanja re declaration	1.2
2/3/2020	M. Burrows	Revised delcarations	0.5
2/3/2020	M. Burrows	Review & comment on draft complaint	0.8
2/3/2020	M. Basche	Review Kaiser Family Foundation report on integrity rule (.3); conduct research re including parties' addresses in Caption of complaint (.2); confer in person with Andrew D. Freeman re same (.1); telephone call to Clerk's Office for the United States District Court for the District of Maryland re same (.2); e-mails from/to co-counsel re same (.1); conduct research re procedures in D.Md. for complaint for judicial review under the APA (.5)	1.4
2/6/2020	A. Freeman	Discuss with Monica R. Basche re Complaint, schedule for our edits and call with co-counsel	0.4
2/6/2020	A. Freeman	E-mails from/to co-counsel re edits to Complaint, schedule for same	0.2
2/6/2020	M. Basche	Review and edit draft Complaint (1.8); confer in person with Andrew D. Freeman re next steps (.3); e-mails from/to Julie Murray re scheduling time to discuss edits to draft Complaint (.2); confer via telephone with Andrew D. Freeman re draft Complaint (.1)	2.4
2/7/2020	A. Freeman	Edit complaint	3.5
2/7/2020	M. Basche	Review and edit draft Complaint	0.9
2/7/2020	M. Basche	Review and edit draft Complaint and e-mail to Andrew D. Freeman re same	2.4
2/8/2020	A. Freeman	E-mail from J. Murray with edits to complaint; review same; e-mail to co-counsel re same (.7); conference call with co-counsel re complaint (.6); further edits and e-mail same to co-counsel (.5); e-mail from J. Murray re logistics of filing (.1)	1.9
2/8/2020	J. Murray	Revised complaint to incorporate co-counsel comments	3.5
2/8/2020	M. Basche	Review Julie Murray's edits to draft Complaint (.4); conference call with Andrew D. Freeman, Julie Murray, Meagan Burrows, and Carrie Flax re same (.6)	1
2/9/2020	C. Flaxman	Re-review and revise draft complaint	1.1
2/9/2020	J. Murray	Revised complaint	3.1
2/10/2020	J. Murray	Reviewed complaint and prepared for filing	2.2
2/10/2020	M. Basche	Review and edit final draft of Complaint and e-mail to Andrew D. Freeman re same	1.1

2/11/2020	A. Freeman	Finalize and file Complaint; review notice of assignment to magistrate judge; discuss with Monica R. Basche re same; e-mail from Monica R. Basche to co-counsel re same; file decline to proceed before magistrate judge	0.4
2/11/2020	M. Burrows	Final review of complaint, fix nits	0.5
2/11/2020	M. Basche	Add Federal Bar number to Complaint and e-mails to Julie Murray, Andrew D. Freeman, Meagan Burrows, Andrew Beck, Carrie Flaxman, and LaClaudia Dyson re preparing Complaint for filing (.2); confer in person with LaClaudia Dyson re same (.1); confer in person with Andrew D. Freeman and LaClaudia Dyson re same (.1); e-mail from/to Meagan Burrows re edit to Complaint (.1); e-mails from/to Andrew D. Freeman and co-counsel re completion of filing of Complaint and procedures for U.S. Magistrate Judge Pilot Program (.5); review completed form indicating that Plaintiffs decline to proceed before a U.S. Magistrate Judge for all further proceedings and e-mail to LaClaudia Dyson re same (.1); confer in person with LaClaudia Dyson re retrieving same from docket, retrieve same from docket, and e-mail to LaClaudia Dyson (.2); e-mail to co-counsel re completed filings (.1); e-mails to/from co-counsel with summonses, Complaint, Civil Cover Sheet, and other documents necessary to effectuate service and serving Complaint (.4); confer in person with Andrew D. Freeman re next steps (.1)	1.9
5/4/2020	A. Freeman	E-mail from J. Murray with Amended Complaint, review same, e-mail to/from Monica R. Basche re same, e-mail from A. Beck re same	0.2
5/4/2020	M. Burrows	Review draft of amended complaint	0.3
5/4/2020	M. Basche	Read and respond to e-mail from Andrew D. Freeman re draft of Amended Complaint	0.4
5/4/2020	M. Basche	Review and edit draft Amendment Complaint, e-mail to Andrew D. Freeman for review	0.5
5/5/2020	A. Freeman	Review and edit Amended Complaint (.7); e-mail to co-counsel re same (.2)	0.9
5/5/2020	M. Basche	Read and respond to e-mail from Julie Murray re edits to draft Amended Complaint	0.1
5/5/2020	M. Basche	Read e-mail from Andrew D. Freeman re edits to draft Amended Complaint	0.1
5/13/2020	J. Murray	Drafted motion to amend complaint and attached amended complaint	3.8
5/14/2020	A. Freeman	E-mails re edits to Amended Complaint to add class action claim; review and edit same and e-mail to co-counsel re same; e-mails from J. Murray and M. Burrows re class definition	0.8
5/14/2020	A. Freeman	Edit motion for amended complaint, e-mail to co-counsel re same	0.7
5/14/2020	M. Burrows	Review/edit draft motion to amend / complaint	0.8

5/14/2020	M. Basche	Review and edit Class Action and Individual Amended Complaint for Declaratory and Injunctive Relief	0.3
5/14/2020	M. Basche	Review and edit Motion for Leave to File Amended and Supplemental Complaint for Declaratory and Injunctive Relief as to Named Plaintiffs and Proposed Class	1.2
5/15/2020	A. Freeman	Finalize motion to amend and forward to LaClaudia Dyson to file	0.1
5/15/2020	J. Murray	Drafted motion to file amended complaint	0.6
5/15/2020	M. Basche	Review and edit Motion for Leave to File Amended and Supplemental Complaint for Declaratory and Injunctive Relief as to Named Plaintiffs and Proposed Class, e-mail same to Andrew D. Freeman for review	0.4
v. Motions practice			
2/13/2020	M. Burrows	Review & comment on PP affiliate declaration	0.2
2/13/2020	M. Basche	Review and edit draft of individual plaintiffs' declarations and e-mail to Andrew D. Freeman re same (1.0); review and edit draft of CEO of Planned Parenthood of Maryland's declaration and e-mail to Andrew D. Freeman re same (.4)	1.4
2/13/2020	A. May	overview	0.1
2/16/2020	C. Flaxman	Review draft declarations	0.5
2/17/2020	A. Freeman	Discuss with Monica R. Basche re edits to declarations in support of Motion for Summary Judgment; e-mails re same	0.1
2/17/2020	J. Murray	Drafted SJ memo	9.3
2/17/2020	M. Basche	E-mail from/to Meagan Burrows re edits to individual plaintiffs' declarations and e-mail to Julie Murray re edits to organizational plaintiff's declaration	0.2
2/18/2020	J. Murray	Drafted SJ memo	9.5
2/18/2020	J. Murray	Reviewed consumer declarations	0.8
2/18/2020	M. Burrows	Revise plaintiff declarations per team comments and finalize	2.2
2/19/2020	A. Freeman	Discuss with Monica R. Basche re Motion for Summary Judgment; e-mails re same	0.2
2/19/2020	J. Murray	Edited SJ memo	5.4
2/19/2020	M. Burrows	Review + comment on SJ brief	2
2/19/2020	M. Basche	Confer in person and via telephone with Andrew D. Freeman re case status and next steps (.1); e-mails from/to Julie Murray and Meagan Burrows re Motion for Summary Judgment briefing schedule and reviewing draft Motion for Summary Judgment (.4)	0.5
2/20/2020	A. Freeman	E-mails re briefing schedule; discuss same with Monica R. Basche; review draft motion re same	0.3
2/20/2020	M. Burrows	Review draft motion for briefing schedule	0.2

2/20/2020	M. Basche	Review e-mails between Julie Murray, Meagan Burrows, and Andrew Beck re edits to and comments on draft Motion for Summary Judgment (.1); e-mail to Julie Murray re revised draft of brief (.1); review Joint Motion for an Expedited Briefing Schedule and Hearing (.1); confer in person with Andrew D. Freeman re same (.1); draft e-mail to Julie Murray re feedback on Joint Motion for an Expedited Briefing Schedule and Hearing and e-mail to Andrew D. Freeman for review (.2); review Andrew D. Freeman edits to e-mail to Julie Murray re feedback on Joint Motion for an Expedited Briefing Schedule and e-mail to Julie Murray (.1); review e-mails between Julie Murray and Andrew D. Freeman re concerns with Joint Motion for an Expedited Briefing Schedule (.1)	0.8
2/21/2020	J. Murray	Drafted SJ memo and reviewed administrative record ISO same	6
2/21/2020	M. Burrows	Proof plaintiff declarations	1.5
2/23/2020	M. Basche	Review and edit draft Motion for Summary Judgment from Julie Murray and e-mail to Andrew D. Freeman for review	2.2
2/25/2020	A. Freeman	Review and edit Joint Motion for Expedited Briefing Schedule	0.1
2/25/2020	M. Basche	Review draft of Parties' Joint Motion for an Expedited Briefing Schedule and Proposed Order (.1); e-mail to co-counsel re Parties' Joint Motion for an Expedited Briefing Schedule (.2)	0.3
2/26/2020	A. Freeman	Finalize and file Joint Motion for Briefing Schedule; Judge Blake's Order granting same	0.1
2/27/2020	A. Freeman	Edit Motion for Summary Judgment brief	1.5
2/28/2020	A. Freeman	Edit Motion for Summary Judgment brief, e-mail same to co-counsel	1
2/28/2020	J. Murray	Revised SJ memo to incorporate co-counsel comments	2.2
2/28/2020	M. Basche	E-mail from/to re including hyperlinks in Motion for Summary Judgment	0.2
2/28/2020	M. Basche	Review Andrew D. Freeman edits to Motion for Summary Judgment	0.1
3/1/2020	J. Murray	Revised SJ memo	2.2
3/1/2020	J. Murray	Drafted SJ motion and proposed order	0.5
3/1/2020	M. Burrows	Review draft motion and proposed order for SJ	0.2
3/2/2020	J. Murray	Revised SJ documents and prepared for filing	1.2
3/2/2020	A. Freeman	Review and edit Proposed Order and Motion	0.3
3/2/2020	M. Basche	Review e-mails between Julie Murray and Andrew D. Freeman re preparing Motion for Summary Judgment for filing, edit draft Motion for Summary Judgment and Proposed Order and e-mail same to Andrew D. Freeman for review	0.3
3/2/2020	M. Basche	E-mail to Julie Murray re edits to Motion for Summary Judgment and Proposed Order	0.1
3/2/2020	M. Basche	Review final draft of Motion for Summary Judgment	0.1
3/2/2020	A. Wu (paralegal)	cite-checking MSJ brief	5

3/20/2020	A. Freeman	E-mails from/to J. Murray re defendants not agreeing to proposed modified schedule re finalizing and filing letter; finalize letter to Judge Blake; modify same in light of new standing order extending deadlines; e-mails and calls to Monica R. Basche and J. Murray re same, finalize letter for filing	1.2
4/10/2020	M. Basche	Read Washington v. Azar order granting the plaintiff's motion for partial summary judgment	0.2
4/14/2020	M. Burrows	Prepare proposed order requested by court + circulate to team	0.5
5/5/2020	A. Freeman	HHS's motion for summary judgment	0.2
5/6/2020	J. Murray	Reviewed HHS d ct brief	1.3
5/6/2020	J. Murray	Conducted legal research ISO response/reply brief	1
5/8/2020	A. Freeman	Review HHS's cross-motion for summary judgment	0.5
5/10/2020	M. Basche	Read Defendants' Opposition to the Plaintiffs' Motion for Summary Judgment and Cross-Motion for Summary Judgment	0.9
5/12/2020	M. Burrows	Class cert research into the 4th; draft class cert memo/motion/order	5.2
5/13/2020	M. Burrows	Draft class cert memo/motion/order; organize and review research re cert factors	4.8
5/14/2020	J. Murray	Conducted legal research on class certification standard issues	2
5/14/2020	J. Murray	Drafted SJ opp/reply	1.6
5/14/2020	M. Burrows	Revised / edit class cert motion/memo/order; review research; prepare declarations	6.8
5/14/2020	M. Basche	Read e-mails from Julie Murray and Meagan Burrows re case law re class certification factors	0.1
5/15/2020	J. Murray	Drafted SJ opp/reply	3.7
5/15/2020	M. Burrows	Revise + class cert papers declarations etc; circulate memo, motion, proposed order, attorney decl and plaintiff decl to team	5.2
5/15/2020	M. Basche	Read e-mail from Meagan Burrows re Motion for Class Certification	0.1
5/17/2020	A. Freeman	Edit motion for class certification and memo in support; draft declaration	1.2
5/17/2020	J. Murray	Reviewed and edited class cert motion and supporting documents	2.8
5/17/2020	M. Burrows	Incorporate team comments on class cert motion/memo , declaration	3.8
5/17/2020	M. Basche	Review and edit Motion for Class Certification, Memorandum in Support, Proposed Order, and Declaration of Kristy Hambrick, e-mail to Andrew D. Freeman for review	2.2
5/17/2020	M. Basche	Read e-mails from Julie Murray, Meagan Burrows, and Carrie Flaxman re Motion to Certify Class and accompanying declarations	0.1
5/18/2020	A. Freeman	E-mail from Monica R. Basche with edits to Andrew D. Freeman declaration in support of motion for class certification; review and accept same; forward same to M. Burrows	0.3
5/18/2020	A. Freeman	Edit memorandum in support of class certification, forward same to M. Burrows, et al.	0.7

5/18/2020	C. Flaxman	Review and Revise class cert papers	0.8
5/18/2020	J. Murray	Drafted SJ opp/reply	8.9
5/18/2020	M. Burrows	Revise class cert docs per team comments; review research; communicate with team re: class cert documents; incorporate results of cite check	7.2
5/18/2020	M. Basche	Edit Declaration of Andrew D. Freeman, e-mail same to Andrew D. Freeman for review	0.4
5/19/2020	J. Murray	Drafted SJ reply/opp	2
5/19/2020	M. Burrows	Revise and finalize class cert docs	4.2
5/20/2020	A. Freeman	E-mail from J. Murray with draft opposition/reply brief; review and edit same	0.5
5/20/2020	M. Basche	Edit Opposition to Defendants' Cross-Motion for Summary Judgment and Plaintiffs' Reply in Support of Motion for Summary Judgment	0.3
5/21/2020	A. Freeman	E-mails from/to J. Murray re signatures on declarations, coordinating editing	0.2
5/21/2020	A. Freeman	Edit reply brief	0.7
5/21/2020	A. Freeman	Research re deference to inconsistent regulations; e-mail to co-counsel re same	0.5
5/21/2020	M. Burrows	Review PP Brief + PPM declaration	1.5
5/21/2020	M. Basche	Edit Declaration of Karen Nelson from Planned Parenthood of Maryland, e-mail to Andrew D. Freeman for review	0.2
5/21/2020	M. Basche	Edit Opposition to Defendants' Cross-Motion for Summary Judgment and Reply in Support of Plaintiffs' Motion for Summary Judgment, e-mail to co-counsel re same	1.9
5/22/2020	A. Freeman	Final edits to reply brief, e-mails re same	1.8
5/22/2020	C. Flaxman	Review and comment on SJ reply brief	1.4
5/22/2020	M. Burrows	Review revised draft of brief	0.8
5/29/2020	A. Freeman	Defendants' Consent Motion for Extension of Time; Order granting same	0.1
6/4/2020	J. Murray	Drafted supplemental brief ISO SJ re rule delaying implementation date	3
6/4/2020	M. Burrows	Review supplemental MSJ brief	0.8
6/5/2020	A. Freeman	Review supplemental summary judgment brief; e-mails re briefing schedule	0.3
6/8/2020	A. Freeman	E-mails re joint motion re schedule	0.2
6/8/2020	M. Burrows	Review joint motion for suppl briefing + proposed order	0.5
6/8/2020	M. Basche	Edit Joint Motion for the Entry of Supplemental Briefing Schedule and Proposed Order, e-mail same to Andrew D. Freeman for review	0.2
6/9/2020	A. Freeman	Supplemental brief re summary judgment	0.1
6/16/2020	A. Freeman	HHS's supplemental opposition	0.2
6/16/2020	J. Murray	Reviewed HHS opp on SJ for interim final rule	0.2
6/16/2020	J. Murray	Drafted reply ISO SJ motion on interim final rule	3.5
6/16/2020	J. Murray	Emailed client and co-counsel re reply ISO SJ on interim final rule	0.2

6/16/2020	M. Basche	Read Supplemental Memorandum in Opposition to Plaintiffs' Motion for Summary Judgment and in Support of Defendants' Motion for Summary Judgment	0.2
6/17/2020	A. Freeman	Review and edit supplemental reply brief (.4); call with Monica R. Basche re same (.1); e-mails re final edits to same (.1)	0.6
6/17/2020	M. Burrows	Review supplemental reply brief re IFR implementation date	0.1
6/17/2020	M. Basche	Edit Supplemental Reply In Support of Plaintiffs' Motion for Summary Judgment and In Opposition to Defendants' Motion for Summary Judgment, e-mail same to Andrew D. Freeman for review	0.3
6/17/2020	M. Basche	Confer via telephone with Andrew D. Freeman re edits to Reply In Support of Plaintiffs' Motion for Summary Judgment and In Opposition to Defendants' Motion for Summary Judgment	0.1
6/17/2020	M. Basche	Review final version of Supplemental Reply In Support of Plaintiffs' Motion for Summary Judgment and In Opposition to Defendants' Motion for Summary Judgment	0.1
6/20/2020	M. Burrows	Research re class cert reply brief; draft reply	4.2
6/21/2020	M. Burrows	Research re class cert reply brief; draft reply	4.8
6/22/2020	A. Freeman	E-mails from/to co-counsel re reply in support of class certification	0.1
6/22/2020	M. Burrows	Research re class cert reply brief; draft reply	3.9
6/22/2020	M. Basche	Read Defendants' Memorandum of Law in Opposition to Consumer Plaintiffs' Motion for Class Certification	0.4
6/22/2020	M. Basche	Read and respond to e-mail from Julie Murray re review of Reply in Support of Plaintiffs' Motion for Class Certification and including a Table of Contents and a Table of Authorities with same	0.2
6/23/2020	M. Burrows	Research re class cert reply brief; draft reply	4
6/24/2020	J. Murray	Edited class cert motion and supporting memo	4.1
6/24/2020	M. Basche	Read and respond to e-mails from Julie Murray and Meagan Burrows re reviewing Reply In Support of Plaintiffs' Motion for Class Certification	0.1
6/24/2020	M. Basche	Edit Reply In Support of Plaintiffs' Motion for Class Certification	1.5
6/25/2020	M. Burrows	Incorporate team comments on class cert reply	5.8
6/25/2020	M. Basche	Read Julie Murray's e-mail re edits to Reply In Support of Plaintiffs' Motion for Class Certification and review Julie Murray's edits to same	0.1
6/26/2020	M. Burrows	Incorporate cite check results on class cert reply; work to file	3.2
6/26/2020	M. Basche	Read and respond to e-mail from Meagan Burrows re filing Reply In Support of Motion for Class Certification (.1); read e-mails from Julie Murray and Meagan Burrows re filing notice of supplemental authority re DACA decision and read draft notice (.1)	0.2

6/29/2020	M. Basche	Read Consumer Plaintiffs' Reply in Further Support of Their Motion for Class Certification	0.4
6/30/2020	A. Freeman	Finalize and file notice of supplemental authority	0.1
6/30/2020	M. Basche	Edit letter to Judge Blake re supplemental authority, e-mail same to Meagan Burrows for review	0.3
6/30/2020	M. Basche	E-mails to/from LaClaudia Dyson re finalizing and filing letter to Judge Blake re notice of supplemental authority	0.3
7/10/2020	A. Freeman	Judge Blake's opinion on cross-motions for summary judgment and motion for class certification	0.7
7/10/2020	J. Zachariasiewicz	Review opinion	0.4
7/10/2020	M. Burrows	Review 1303 SJ order	1.2
10/7/2020	M. Burrows	Review extension motion draft re appeal briefing	0.1
10/7/2020	M. Basche	Review draft Motion for Extension of Time (.1); e-mail to co-counsel re same (.1)	0.2
10/8/2020	A. Freeman	E-mails re defendants' request for extension of time; motion filed; order granting motion	0.1
12/4/2020	M. Burrows	Review + edit draft extension motion	0.2
12/4/2020	A. Freeman	Edit motion for extension of time to add Andrew D. Freeman conflicts; e-mail same to J. Murray, et al.	0.3
12/4/2020	A. Freeman	Motion to extend time filed; order granting motion to extend time; calendar new dates	0.1
vi. attending court hearings			
3/26/2020	M. Basche	Read e-mails from Andrew D. Freeman and co-counsel re rescheduling March 26, 2020 telephone call with Judge Blake	0.1
4/14/2020	A. Freeman	Conference call with Judge Blake and counsel re briefing schedule	0.2
4/14/2020	J. Murray	Participated in status conference	0.2
4/14/2020	M. Burrows	Conference call with court	0.2
4/14/2020	M. Basche	Read e-mail from Andrew D. Freeman re proposed Motions for Summary Judgment briefing schedule (.1); conference call with Judge Blake, Andrew D. Freeman, Julie Murray, Carrie Flaxman and opposing counsel re same (.3); edit Proposed Order re Motions for Summary Judgment briefing schedule, e-mail	0.8
x. Fee petition preparation			
7/15/2020	A. Freeman	same	0.1
7/17/2020	A. Freeman	Call with LaClaudia Dyson re filing bill of costs	0.1

7/28/2020	A. Freeman	E-mails to/from/to J. Murray re EAJA fee petition	0.2
7/28/2020	A. Freeman	Research re EAJA rates, inflation adjustment	0.1
7/28/2020	M. Basche	Read e-mails between Andrew D. Freeman and Julie Murray re fee petition	0.1
1/11/2021	A. Freeman	E-mails from/to J. Murray and M. Burrows re gathering our bills for fee petition	0.1
1/11/2021	A. Freeman	E-mails to/from Manuel Lopez re preparing BGL's draft bill	0.1
1/25/2021	A. Freeman	Review and edit bill for fee petition	0.6
10/4/2021	J. Murray	drafted fee letter	1
10/5/2021	J. Murray	reviewed and finalized billing records for settlement letter	1.2
10/25/2021	A. Bajwa (paralegal)	Add litigation phase for each row of spreadsheet of billing records	3
10/25/2021	M. Cohen	familiarize myself with fee petition requirements	1
10/26/2021	M. Cohen	reviewed and edited itemized spreadsheet of billing records	1
10/26/2021	M. Cohen	draft letter to court requesting permission to file only motion on Th 10/28 and memo on later date	0.5
10/27/2021	M. Cohen	draft motion for fees	2

TOTAL ATTORNEY HOURS 353.8

TOTAL PARALEGAL HOURS 8

ATTORNEYS' FEES REQUEST \$71,800